

ENGINEERING CHANGE NOTICE

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1. ECN No 616399

Proj.
ECN

2. ECN Category (mark one) Supplemental <input type="checkbox"/> Direct Revision <input checked="" type="checkbox"/> Change ECN <input type="checkbox"/> Temporary <input type="checkbox"/> Standby <input type="checkbox"/> Supersedure <input type="checkbox"/> Cancel/Void <input type="checkbox"/>	3. Originator's Name, Organization, MSIN, and Telephone No. B. C. Carpenter, 7E720, R2-12, 372-2349		4. Date 10/28/94
	5. Project Title/No./Work Order No. TANK 241-BY-108 TANK CHARACTERIZATION PLAN	6. Bldg./Sys./Fac. No. 2750/200E	7. Approval Designator Q
	8. Document Numbers Changed by this ECN (includes sheet no. and rev.) WHC-SD-WM-TP-275 new OA	9. Related ECN No(s). N/A	10. Related PO No. N/A
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13a. Justification (mark one) As-Found <input type="checkbox"/>	Criteria Change <input checked="" type="checkbox"/>	Design Improvement <input type="checkbox"/>	Environmental <input type="checkbox"/>
	Facilitate Const. <input type="checkbox"/>	Const. Error/Omission <input type="checkbox"/>	Design Error/Omission <input type="checkbox"/>
13b. Justification Details Partial revision to incorporate comments made after this document was issued.			
14. Distribution (include name, MSIN, and no. of copies) See attached Distribution Sheet.			RELEASE STAMP OFFICIAL RELEASE (2) BY WHO DATE DEC 08 1994 [Signature]

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15. Design
Verification
Required☐ Yes
☒ No

16. Cost Impact

ENGINEERING

CONSTRUCTION

Additional ☐ \$
Savings ☐ \$Additional ☐ \$
Savings ☐ \$

17. Schedule Impact (days)

Improvement ☐
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18. Change Impact Review: Indicate the related documents (other than the engineering documents identified on Side 1) that will be affected by the change described in Block 12. Enter the affected document number in Block 19.

SDD/DD	<input type="checkbox"/>	Seismic/Stress Analysis	<input type="checkbox"/>	Tank Calibration Manual	<input type="checkbox"/>
Functional Design Criteria	<input type="checkbox"/>	Stress/Design Report	<input type="checkbox"/>	Health Physics Procedure	<input type="checkbox"/>
Operating Specification	<input type="checkbox"/>	Interface Control Drawing	<input type="checkbox"/>	Spares Multiple Unit Listing	<input type="checkbox"/>
Criticality Specification	<input type="checkbox"/>	Calibration Procedure	<input type="checkbox"/>	Test Procedures/Specification	<input type="checkbox"/>
Conceptual Design Report	<input type="checkbox"/>	Installation Procedure	<input type="checkbox"/>	Component Index	<input type="checkbox"/>
Equipment Spec.	<input type="checkbox"/>	Maintenance Procedure	<input type="checkbox"/>	ASME Coded Item	<input type="checkbox"/>
Const. Spec	<input type="checkbox"/>	Engineering Procedure	<input type="checkbox"/>	Human Factor Consideration	<input type="checkbox"/>
Procurement Spec.	<input type="checkbox"/>	Operating Instruction	<input type="checkbox"/>	Computer Software	<input type="checkbox"/>
Vendor Information	<input type="checkbox"/>	Operating Procedure	<input type="checkbox"/>	Electric Circuit Schedule	<input type="checkbox"/>
OM Manual	<input type="checkbox"/>	Operational Safety Requirement	<input type="checkbox"/>	ICRS Procedure	<input type="checkbox"/>
FSAR SAR	<input type="checkbox"/>	IEFD Drawing	<input type="checkbox"/>	Process Control Manual/Plan	<input type="checkbox"/>
Safety Equipment List	<input type="checkbox"/>	Cell Arrangement Drawing	<input type="checkbox"/>	Process Flow Chart	<input type="checkbox"/>
Radiation Work Permit	<input type="checkbox"/>	Essential Material Specification	<input type="checkbox"/>	Purchase Requisition	<input type="checkbox"/>
Environmental Impact Statement	<input type="checkbox"/>	Fac. Proc. Samp. Schedule	<input type="checkbox"/>	Tickler File	<input type="checkbox"/>
Environmental Report	<input type="checkbox"/>	Inspection Plan	<input type="checkbox"/>		<input type="checkbox"/>
Environmental Permit	<input type="checkbox"/>	Inventory Adjustment Request	<input type="checkbox"/>		<input type="checkbox"/>

19. Other Affected Documents: (NOTE: Documents listed below will not be revised by this ECN.) Signatures below indicate that the signing organization has been notified of other affected documents listed below.

Document Number/Revision

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20. Approvals

Signature		Date	Signature		Date
<u>OPERATIONS AND ENGINEERING</u>			<u>ARCHITECT-ENGINEER</u>		
Cog. Eng.	B. C. Carpenter	10/28/94	PE		
Cog. Mgr.	C. S. Haller	10/31/94	QA		
QA	D. C. Board	12/7/94	Safety		
Safety			Design		
Environ.			Environ.		
Other			Other		
Proj.	S. C. Gonneen see attached				
Proj.	R. A. Jenkins see attached				
Proj.	J. G. Kristofzski	11/21/94			
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616399

15. Design Verification Required

☐ Yes
☒ No

16. Cost Impact

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Additional ☐ \$
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CONSTRUCTION

Additional ☐ \$
Savings ☐ \$

17. Schedule Impact (days)

Improvement ☐
Delay ☐

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Operating Specification	<input type="checkbox"/>	Interface Control Drawing	<input type="checkbox"/>	Seems Multiple Unit Listing	<input type="checkbox"/>
Criticality Specification	<input type="checkbox"/>	Calibration Procedure	<input type="checkbox"/>	Test Procedures/Specification	<input type="checkbox"/>
Conceptual Design Report	<input type="checkbox"/>	Installation Procedure	<input type="checkbox"/>	Component Index	<input type="checkbox"/>
Equipment Spec.	<input type="checkbox"/>	Maintenance Procedure	<input type="checkbox"/>	ASME Coded Item	<input type="checkbox"/>
Const. Spec.	<input type="checkbox"/>	Engineering Procedure	<input type="checkbox"/>	Human Factor Consideration	<input type="checkbox"/>
Measurement Spec.	<input type="checkbox"/>	Operating Instruction	<input type="checkbox"/>	Computer Software	<input type="checkbox"/>
Vendor Information	<input type="checkbox"/>	Operating Procedure	<input type="checkbox"/>	Electric Circuit Schedule	<input type="checkbox"/>
QM Manual	<input type="checkbox"/>	Operational Safety Requirement	<input type="checkbox"/>	ICRS Procedure	<input type="checkbox"/>
FSAR/SAR	<input type="checkbox"/>	ISD Drawing	<input type="checkbox"/>	Process Control Manual/Plan	<input type="checkbox"/>
Safety Equipment List	<input type="checkbox"/>	Self Arrangement Drawing	<input type="checkbox"/>	Process Flow Chart	<input type="checkbox"/>
Radiation Work Permit	<input type="checkbox"/>	Essential Facility Description	<input type="checkbox"/>	Purchase Recommendation	<input type="checkbox"/>
Environmental Impact Statement	<input type="checkbox"/>	Exp. Prog. Control Schedule	<input type="checkbox"/>	Tickler File	<input type="checkbox"/>
Environmental Report	<input type="checkbox"/>	Inspection Plan	<input type="checkbox"/>		
Environmental Permit	<input type="checkbox"/>	Inventory Adjustment/Request	<input type="checkbox"/>		

19. Other Affected Documents: (NOTE: Documents listed below will not be revised by this ECM.) Signatures below indicate that the signing organization has been notified of other affected documents listed below.

Document Number/Revision

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20. Approvals

Signature	Date	Signature	Date
<u>OPERATIONS AND ENGINEERING</u>		<u>ARCHITECT-ENGINEER</u>	
Dep. Eng. S. C. Gorden	12/29/94	PE	
Dep. Mgr. C. G. Haller	12/29/94	RA	
SA		Safety	
Safety		Design	
Environ.		Environ.	
Other.		Other	
Proj. S. C. Gorden	11/29/94		
Proj. R. A. Jenkins			
Proj. J. G. Kristofczak	11/22/94		
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Post-it Fax Note

7871

Date	12-5	Page	1
To	Cherina Hani	From	SC Gorden
Cell Dept.		Co	
Phone #	373-1097	Phone #	6-3286
Fax #	373-6955	Fax #	3-0169

ENGINEERING CHANGE NOTICE				4 of 4 Page 2 of 2	1. ECR (use no. from pg. 1) 616399
15. Design Verification Required <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		16. Cost Impact <div style="display: flex; justify-content: space-between;"> <div>ENGINEERING Additional <input type="checkbox"/> \$ Savings <input type="checkbox"/> \$</div> <div>CONSTRUCTION Additional <input type="checkbox"/> \$ Savings <input type="checkbox"/> \$</div> </div>		17. Schedule Impact (days) Improvement <input type="checkbox"/> Delay <input type="checkbox"/>	
18. Change Impact Review: Indicate the related documents (other than the engineering documents identified on Side 1) that will be affected by the change described in Block 12. Enter the affected document number in Block 19.					
SQD/DD		Seismic/Stress Analysis		Tank Calibration Manual	
Functional Design Criteria		Stress/Design Report		Health Physics Procedure	
Operating Specification		Interface Control Drawing		Spares Multiple Unit Listing	
Criticality Specification		Calibration Procedure		Test Procedures/Specification	
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Procurement Spec.		Operating Instruction		Computer Software	
Vendor Information		Operating Procedure		Electrical Circuit Schedule	
QM Manual		Operational Safety Requirement		ICRS Procedure	
FSAR/SAR		IEPD Drawing		Process Control Manual/PLN	
Safety Equipment List		Cask Arrangement Drawing		Process Flow Chart	
Radiation Work Permit		Essential Materials Specification		Purchase Requisition	
Environmental Impact Statement		Fac. Proc. Temp. Schedule		Ticket File	
Environmental Report		Inspection Plan			
Environmental Permit		Inventory Adjustment Request			
19. Other Affected Documents: (NOTE: Documents listed below will not be revised by this ECR.) Signatures below indicate that the signing organization has been notified of other affected documents listed below.					
Document Number/Revision		Document Number/Revision		Document Number/Revision	
20. Approvals					
Signature		Date	Signature		Date
OPERATIONS AND ENGINEERING					
Sup. ENS.	B. C. Carpenter	10/28/94	ARCHITECT-ENGINEER		
Sup. MFR.	C. S. Heller	10/31/94	PE		
QA	C. D. Board		SA		
Safety			Safety		
Environ.			Design		
Other			Environ.		
Proj.	S. C. Gonneen		User		
Proj.	R. A. Jenkins	11/2/94			
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7. Abstract This document is a plan which serves as the contractual agreement between the Characterization Program, Sampling Operations, WHC 222-S Laboratory, Oak Ridge National Laboratory, and PNL tank vapor program. The scope of this plan is to provide guidance for the sampling and analysis of vapor samples from tank 241-BY-108.		
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CHANGE CONTROL RECORD				
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SAMPLE EVENT A

**VAPOR SAMPLING
IN FISCAL YEAR 1995**

SAMPLE EVENT A: VAPOR SAMPLING IN FISCAL YEAR 1995

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LIST OF ACRONYMS

BY-108	Tank 241-BY-108
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CGM	combustible gas meter
DOT	Department of Transportation
DQO	data quality objective
ECN	engineering change notice
EPA	Environmental Protection Agency
ESH&QA	Environmental Safety, Health, and Quality Assurance
FAS	Field Analytical Services
GC/MS	gas chromatography/mass spectrometry
IC	ion chromatography
IDLH	immediately dangerous to life and health
LFL	lower flammability limit
OGIST	Oregon Graduate Institute of Science and Technology
ORNL	Oak Ridge National Laboratory
PNL	Pacific Northwest Laboratory
ppbv	parts per billion by volume
ppmv	parts per million by volume
RCRA	Resource Conservation and Recovery Act
SML	Sampling and Mobile Laboratories
SUMMA®	registered trademark for passivated stainless steel canister
TCP	Tank Characterization Plan
TNMHC	Total Non-Methane Hydrocarbons
TRP	Toxicology Review Panel
TO-12	EPA task order protocol 12
TO-14	EPA task order protocol 14
TOC	total organic carbon
TWRS	Tank Waste Remediation System
VSS	vapor sampling system
WHC	Westinghouse Hanford Company

TANK 241-BY-108 VAPOR SPACE SAMPLING AND ANALYSIS PLAN

1.0 INTRODUCTION

Vapor samples are used to identify potential flammable and fugitive vapor emissions from the tanks which could become worker health and safety issues. Sampling of the vapor space will identify: 1) volatile compounds above the surface of the waste; and 2) the amount of gases generated by chemical or radiolytic reactions within the waste.

2.0 SCHEDULED SAMPLING EVENT

The following information provides the methodology and procedures to be used in the preparation, retrieval, transport, analysis, and reporting of results for vapor space samples retrieved from tank BY-108. The requirements for sample event A, contained within appendix A of this TCP, are within the scope of work specified in the appropriate laboratory financial plans. Any decisions, observations, or deviations to this characterization plan made during sample receipt, preparation, and analysis shall be documented in the deliverable report.

2.1 Preparation of Sample Media Containers

The laboratory performing the contracted analytical work shall supply prepared and labeled sample containers (SUMMA® canisters and/or selective sorbent sampling media) to Field Analytical Services (FAS) at least 48 hours in advance of the scheduled sampling date. Each sample media container shall be certified that preparation procedures were performed and it complies to cleanliness requirements. FAS shall provide sample identification numbers following the quality assurance/quality control format given in Section 3.1 and other label information to the laboratories as requested.

2.2 Flammability of Vapor Space Gases

Prior to this sampling event and performing any intrusive work on a tank, an assessment of the flammability of the tank vapor space gases is required by standard WHC safety practices. The flammability test is identified in the sampling event work package and performed by Industrial Hygiene Field Services personnel using a combustible gas meter (CGM). Under present guidelines no operational or sampling activity is permitted if a single sample of the tank vapor fuel content is greater than 20% of the lower flammability limit (LFL). If the CGM sample measures a total fuel content between 10% and 20% of the LFL, a vapor sampling activity may continue under concurrent CGM monitoring to better identify the hazard level. Under 10% of the LFL the tank is not considered a flammability problem and all scheduled work can proceed (Osborne et al. 1994).

2.3 Sample Collection

In fiscal year 1995, the tank BY-108 vapor space shall be sampled through a heated probe in riser 1 using the vapor sampling system (VSS) in accordance with laboratory operating procedure LO-080-450 "Collection of SUMMA® Canisters & Sorbent Tube Samples Using the Vapor Sampling System (VSS)". Table A.1 specifies the sample type, the type of collection media to

be used, and the number of samples requested. Table A.2 provides a sequence of sampling activities and specifies the sample collection time and the flow rate through the sample collection tubes.

A cleanliness check shall be performed in accordance with procedure LO-080-450, Appendix C. Cleanliness of the VSS shall also be addressed by collecting ambient air SUMMA® samples prior to sampling the tanks using the following conditions: 1) with the VSS manifold and transfer lines fully heated; and 2) without the VSS, upwind of BY-108.

The GC/FID shall be used to monitor organic vapors during the sampling event. The GC/FID shall be operated in accordance with LO-080-450, Appendix D and Bellus (1993).

Table A.1. General Sampling Information

Sample Container	Prepared By	Preparation Procedure	Sample Type	Number of Samples
SUMMA®	PNL	PNL-TVP-02	Tank Air	6
SUMMA®	PNL	PNL-TVP-02	Ambient Air ³	2
Triple Sorbent Traps	ORNL	AC-OP-300-0907 CASD-AM-300-WP01 ⁴	Tank Air	12
	ORNL	AC-OP-300-0907	Field Blank	2
	ORNL	AC-OP-300-0907	Trip Blank	2
Sorbent Trap System for NH ₃ , NO ₂ , NO, H ₂ O	PNL	PNL-TVP-09	Tank Air	6
	PNL	PNL-TVP-09	Trip Blank	3
Tritium Trap	WHC	LA-548-111	Tank Air	1
HEPA Filters	WHC	N/A	Tank Air	4

³One sample taken through the VSS, one sample taken upwind of the tank.

⁴Preparation procedure for samples spiked with surrogate(s).

2.4 Radiation Screening and Sample Transport

All vapor samples shall be stored at the 222-S Laboratory Annex while performing a radiological survey of certain items used during sampling. Surveys are conducted to assure compliance with Department of Transportation (DOT) shipping regulations and offsite laboratory acceptance criteria. Items surveyed include four HEPA filters and one tritium trap and shall be analyzed following procedures specified in a Letter of Instruction (Bratzel 1994). These procedures are reproduced in Table A.4.

The results from the radiation screening are submitted to and shall be evaluated by Sampling and Mobile Laboratories to ensure the samples meet the criteria specified in Table A.3. Sampling and Mobile Laboratories shall provide a report to each analytical laboratory to identify the number of picocuries per sample (pCi/sample) for each sample that is submitted for analysis.

Table A.2. List of Samples and Activities.

SAMPLE CODE	SAMPLE/ACTIVITY DESCRIPTION	SAMPLER POSITION DURING COLLECTION	GAS FLOW RATE	SAMPLE DURATION
--	Purge VSS with ambient air ⁵	N/A	5,450 mL/min	30 min.
01	Collect ambient air sample SUMMA #1	Upwind of BY-108	N/A	1 min.
--	Collect GC sample and initiate GC run	N/A	N/A	N/A
02	Collect ambient air sample SUMMA #2	Port 15	N/A	1 min.
--	Leak test	N/A	N/A	N/A
--	Purge VSS with tank air	N/A	5,450 mL/min	30 min.
--	Measure tank pressure	N/A	N/A	N/A
03	Collect Tritium Trap	Sorbent line 8	200 mL/min	5 min.
--	Collect GC sample and initiate GC run	N/A	N/A	N/A
04	Collect SUMMA #3	Port 11	N/A	1 min.
05	Collect SUMMA #4	Port 13	N/A	1 min.
06	Collect SUMMA #5	Port 15	N/A	1 min.
07	Collect SUMMA #6	Port 12	N/A	1 min.
08	Collect SUMMA #7	Port 14	N/A	1 min.
09	Collect SUMMA #8	Port 16	N/A	1 min.
10	Collect Triple Sorbent Trap (TST) sample #1	Sorbent line 9	25 mL/min	2 min.
11	Collect TST sample #2	Sorbent line 10	25 mL/min	2 min.
12	Collect TST sample #3	Sorbent line 8	25 mL/min	2 min.
13	Open, close, & store TST Field Blank #1	In VSS truck	0 mL/min	N/A
14	Collect TST sample #4	Sorbent line 10	25 mL/min	2 min.
15	Collect TST sample #5	Sorbent line 9	50 mL/min	5 min.
16	Collect TST sample #6	Sorbent line 10	50 mL/min	5 min.
17	Collect TST sample #7	Sorbent line 8	50 mL/min	5 min.
18	Collect TST sample #8	Sorbent line 10	50 mL/min	5 min.
19	Collect TST sample #9	Sorbent line 9	100 mL/min	5 min.
20	Open, close, & store TST Field Blank #2	In VSS truck	0 mL/min	N/A
21	Collect TST sample #10	Sorbent line 10	100 mL/min	5 min.
22	Collect TST sample #11	Sorbent line 8	100 mL/min	5 min.
23	Collect TST sample #12	Sorbent line 10	100 mL/min	5 min.
24, 25	Store TST Trip Blanks #1 & #2	None	None	None
26	Collect NH ₃ /NO _x /H ₂ O Sorbent Trap #1	Sorbent line 9	200 mL/min	15 min.
27	Collect NH ₃ /NO _x /H ₂ O Sorbent Trap #2	Sorbent line 10	200 mL/min	15 min.
28	Collect NH ₃ /NO _x /H ₂ O Sorbent Trap #3	Sorbent line 8	200 mL/min	15 min.
29	Collect NH ₃ /NO _x /H ₂ O Sorbent Trap #4	Sorbent line 10	200 mL/min	15 min.
30	Collect NH ₃ /NO _x /H ₂ O Sorbent Trap #5	Sorbent line 9	200 mL/min	15 min.
31	Collect NH ₃ /NO _x /H ₂ O Sorbent Trap #6	Sorbent line 10	200 mL/min	15 min.
32, 33, 34	Store NH ₃ /NO _x /H ₂ O Trap Trip Blanks #1, #2, & #3	None	None	None
35	Remove upstream HEPA Filter from HEPA transfer box	Upstream of box	Continuous	
36	Remove downstream HEPA Filter from HEPA transfer box	Downstream of box	Continuous	
37	Remove upstream HEPA Filter from VSS	Upstream of VSS	Continuous	
38	Remove downstream HEPA Filter from VSS	Downstream of VSS	Continuous	

⁵ Not required if ambient air purge incorporated in VSS setup.

Table A.3. Limits For Acceptable Radionuclide Activity Levels.

Organization	Total α	Total B/y	Tritium	Units
PNL Analytical Chemistry Laboratory	≤ 100	≤ 400	--	pCi/g
Oak Ridge National Laboratory	≤ 135	≤ 450	--	pCi/g
WHC-CM-2-14 ⁶	≤ 60	≤ 200	--	pCi/g

⁶ Samples above DOT limits may be shipped as Limited Quantity of Radioactive Material in accordance with DOT approval.

Trip blanks and field blanks are to accompany the waste samples to the laboratory. For specific information concerning sample and blank handling, custody, and transport refer to quality assurance/quality control requirements in Section 3.1.

2.5 Tank-Specific Analytical Procedures

A flowchart and narrative showing the sample collection, isolation, and analysis scheme is presented as Figure A.1. All samples are to be prepared and analyzed in accordance with this scheme. Sample receipt, custody, preparation, and analysis shall be performed in accordance with approved procedures.

Sample material retrieved from the tank BY-108 vapor space and contained within the SUMMA® canisters shall be analyzed for total non-methane hydrocarbons following modified EPA procedure TO-14 and the permanent gases CO₂, CO, CH₄, H₂, and N₂O using gas chromatography. The sorbent traps contain analyte-specific sorbent media and shall be analyzed for these specific analytes. The triple sorbent traps contain sorbent media designed to allow a broad range of organic species to be retained. Table A.4 identifies the appropriate laboratory procedures used in each analysis.

Any analyses prescribed by this document, but not performed, shall be identified and justification for non-performance written in the appropriate data report. If there are insufficient samples to perform all requested analyses, Tank Vapor Safety Resolution Program personnel shall be contacted.

Figure A.1. Test Plan Outline and Flowchart for Tank Vapor Space Characterization.

- Step 1 Labs: Prepare sample and blank containers at contract laboratories. Label containers using sample identification numbers and sampling data provided by Field Analytical Services.
- Step 2 Labs: Ship containers to Field Analytical Services at least 48 hours in advance of scheduled sampling event. Receipt and control of containers shall be guided by procedures PNL-TVP-07 and CASD-AM-300-MP02 (ORNL).
- Step 3 SML: If tank is safe with regard to flammability, set up vapor sampling system (VSS) and collect samples following procedure LO-080-450 and guidelines in Table A.2.
- Step 4 SML: Move to the 222-S Laboratory, the vapor sample containers for locked storage, and the HEPA filters and Tritium Trap for radiological survey.
- Step 5 SML: Using radiological survey report results, determine if samples are acceptable to ship offsite (see Section 2.4).
- Step 6 SML: If determined to be acceptable by offsite laboratory requirements and WHC-CM-2-14, ship samples and blanks following DOT requirements. If not acceptable to ship, maintain samples in storage and contact J. W. Osborne of Vapor Issue Resolution Program for further direction.
- Step 7 Labs: Perform laboratory analyses.
 - A. SUMMA® Canisters (PNL): Perform modified full scan EPA-TO-14. Perform permanent gas analysis for the following: H_2 , CO, N_2O , CH_4 , CO_2 .
 - B. Sorbent Traps (PNL): Perform gravimetric analysis for moisture. Perform selective electrode analysis for NH_3 . Analyze NO and NO_2 Traps.
 - C. Triple Sorbent Traps (ORNL): Perform organic vapor analysis.
- Step 8 Labs and SML: Following the Section 6.0 reporting requirements, deliver a Format VI Report to the Vapor Issue Resolution Safety Program according to the contractual agreements.

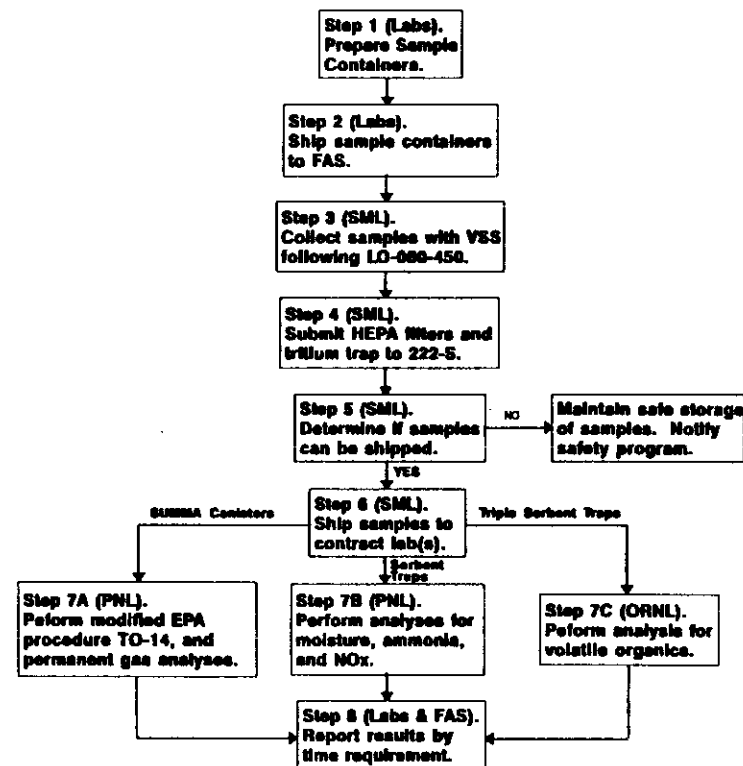


Table A.4. BY-108 Sample Chemical, Physical, and Radiological Analytical Requirements

PROJECT		BY-108 VAPOR		COMMENTS		REPORT FORMATS			NUMBER OF SAMPLE/BLANK CONTAINERS PROCESSED				
Plan Number	WHC-SD-WM-TP-275			Type 3 vapor sampling system (VSS) using heated vapor probes.	I	Early Notify		Organization	WHC	PNL	ORNL	TOTAL	
Tank	BY-108				II	Process Control		SUMMA® Canister	3 ^a	3/2		8	
Program Contact	J. W. Osborne J. L. Huckaby				III	Safety Screen		Sorbent Trap System ^b		6/3		9	
TWRS Contact	B. C. Carpenter C. S. Homi				IV	Waste Management		Triple Sorbent Trap			12/4	16	
					V	RCRA Compliance		HEPA Filter	4			4	
					VI	Special		Tritium Trap	1			1	
Lab Project Coordinator	S. C. Goheen (PNL) R. A. Jenkins (ORNL)												
PRIMARY ANALYSES					QUALITY CONTROL ^c				CRITERIA				REPORT FORMAT
ANALYSIS METHOD	PRIMARY ANALYTE	PROCEDURE	LAB	SAMPLE PREP	SAMPLE CONTAINER	NO. OF SAMPLES	SURR SPIKE ^d	NO. OF BLANKS	NOTIFICATION LIMIT (NL) ^e	EXPECTED RANGE	PRECN %NL	ACCURACY %NL	
GCM	Flammability	CGIMX251 CGITMX410	N/A	N/A	N/A	1	N/A	N/A	>20% LFL	<10% LFL	N/A	N/A	I
EPA TO-14 GC/MS	Organic* Speciation	PNL-TVP-01 PNL-TVP-02 PNL-TVP-03	PNL	Direct	SUMMA®	3	none	2	≥ 4000 ppmv n-Butanol 50% IDLH for all others*	<100 ppbv	±25%	70-130%	I, VI
GC/TCD	CO ₂ CO CH ₄ H ₂ H ₂ O	PNL-TVP-05	PNL	Direct	SUMMA®	3	none	2	N/A ≥ 20% LFL ≥ 20% LFL ≥ 20% LFL not available	not available < 5 ppmv not available 600-800 ppmv 700-900 ppmv	±25% ±25% ±25% ±25%	70-130%	VI I, VI I, VI I, VI
IC	NO NO ₂	PNL-TVP-09 PNL-ALO-212	PNL	H ₂ O Extraction	Sorbent Trap	6	none	3	≥ 50 ppmv ≥ 25 ppmv	≥ 2 ppmv ≥ 0.1 ppmv	±25% ±25%	70-130%	I, VI I, VI
Gravimetric	H ₂ O	PNL-TVP-09	PNL	Direct	Sorbent Trap	6	none	3	N/A	≥ 3 mg/L	±25%	70-130%	VI
Selective Electrode	NH ₃	PNL-ALO-226 PNL-TVP-09	PNL	H ₂ O Extraction	Sorbent Trap	6	none	3	≥ 250 ppmv	≥ 2 ppmv	±25%	70-130%	I, VI
GC/MS	Organics**	AC-MM-1-003153 AC-MM-1-003157	ORNL	Thermal Desorption	Triple Sorbent Trap	12	all	4 ^f	≥ 4000 ppmv n-Butanol 50% IDLH for all others**	< 100 ppbv	±25%	70-130%	I, VI
Total α Total β Total γ	Radon Daughters	LA-508-110 LA-508-111 LA-508-162	WHC	Direct	HEPA Filter	4	N/A	N/A	≥ 60 pCi/g α ≥ 200 pCi/g β ≥ 200 pCi/g γ	< 60 pCi/g α < 200 pCi/g β < 200 pCi/g γ	±25% ±25% ±25%	70-130%	I, II
Liq. Scin.	Tritium	LA-548-111	WHC	Direct	Tritium Trap	1	N/A	N/A	N/A	not available	±25%	N/A	II
GC/FID	Organics	LO-080-450	FAS	Direct	On-line	N/A	N/A	N/A	N/A	N/A	N/A	N/A	II, VI

N/A: Not Applicable

a Three canisters will be archived at PNL until arrangements can be made for transport and analytical work at the OGIST laboratory.

b System contains individual sorbent media sections for NO_x, NH₃, & H₂O.

c Multiple samples and blanks are taken.

d Samples spiked with surrogates.

e Action required if any compound exceed 50% IDLH.

f Includes two trip and two field blanks.

*Acetone, acetonitrile, benzene, 1,3- butadiene, butanol, n-butanol, n-hexane, methane, propane nitrile. Other organic species detected at levels deemed sufficient by the laboratory scientist to be of potential toxicological concern shall be reported following Format I.

**Acetone, acetonitrile, benzene, butanol, n-dodecane, n-hexane, propane nitrile, tributyl phosphate, n-tridecane. Other organic species detected at level deemed sufficient by the laboratory scientist to be of potential toxicological concern shall be reported following Format I.

3.0 QUALITY ASSURANCE/QUALITY CONTROL

This Tank Characterization Plan and analytical laboratory operations are approved by the WHC Environmental Safety, Health, and Quality Assurance (ESH&QA) Program provided the following conditions are met.

- 1) Each laboratory has a quality assurance program that meets the applicable requirements of DOE order 5700.6C, American Society of Mechanical Engineers NQA-1, EPA QAMS-005/80 or United States 10 CFR 830.120.
- 2) Each analysis and media preparation procedure given in Tables A.1 and A.4 are documented by the laboratory and available to ESH&QA.
- 3) Any modifications made to, or deviations from, the prescribed procedures are documented and justified in the deliverable report.

The PNL tank vapor program has an impact level II Laboratory Quality Assurance Plan (Barnes 1994) written to comply with 5700.6C. ESH&QA will qualify laboratories for continued use by the TWRS Characterization program after receipt of the Laboratory quality assurance plans, and an audit and corrective action phase.

3.1 Sampling Operations

The laboratory supplying the sample collection media shall initiate the chain of custody in accordance with the laboratory operating procedure LO-090-443, "Chain-of-Custody for RCRA and CERCLA Protocol Samples" using unique sample label and identification numbers provided by Field Analytical Services. Each sample identification number shall have the following format:

SXXXX-WYY-LLL, where:

XXXX	=	unique number assigned to the sampling event,
W	=	a letter code indicating the day of a multi-day sampling event,
YY	=	a 2-digit sample code found in Table A.2, List of Sample and Activities, column one.
LLL	=	a special lab assigned code.

Once the sample collection media has been received by FAS from the laboratory, it shall remain in the physical control of the custodian, locked in a secure area, or prepared for shipping with tamper evident tape. The sample collection media shall also remain in a controlled area under conditions specified on the chain of custody form.

Applicable operating procedures for the tank BY-108 vapor space sampling activities are contained in work package ES-94-1159. Vapor samples, trip blanks, and field blanks are to be collected in accordance with Tables A.1 and A.2 and laboratory operating procedure LO-080-450 "Collection of SUMMA® Canisters & Sorbent Tube Samples Using the Vapor Sampling System (VSS)" and shipped to the laboratory by Field Analytical Services in accordance with Hazardous Material Packaging and Shipping, WHC-CM-2-14.

All sampling activities shall be documented in controlled field logbooks maintained by sampling personnel (Sampling and Mobile Laboratories) and shall contain, but are not limited to:

- 1) identification of tank and riser number and photographs of the sample location in which the sampling is conducted,
- 2) if any anomalies are observed, corresponding sample identification numbers, flow rates, pressures, temperatures, and other operational parameters affecting the sample,
- 3) any conditions that the sampler may observe during the sampling event (i. e., odors, nearby machinery in operation, etc.),
- 4) names and titles of personnel involved in the field activity and their responsibilities,
- 5) instrument calibration dates.

Sampling and Mobile Laboratories is responsible for documenting any problems and procedural changes affecting the validity of the sample in a field notebook and shall enter this information in the comment section of the chain-of-custody form for addition to the data reports.

3.2 Laboratory Operations

Prepared and labeled sample collection containers, trip blanks, and field blanks are supplied by the performing laboratories to Field Analytical Services. The SUMMA® canisters and Sorbent Trap Systems are prepared and certified following the laboratory quality control procedures identified in Table A.1. The laboratory supplying the sample collection media shall initiate the chain of custody in accordance with the laboratory operating procedure LO-090-443, "Chain-of-Custody for RCRA and CERCLA Protocol Samples" using sample label and identification numbers provided by Field Analytical Services.

The sample receipt and control procedures used in the PNL laboratories is PNL-TVP-07. Oak Ridge National Laboratory shipping and receiving is done by procedure CASD-AM-300-WP02. Analyses will be performed according to the procedures in Table A.4.

Method specific quality control such as calibrations and blanks are also found in the analytical procedures. Sample quality control (duplicates, spikes, standards) are identified in Table A.4. If no criteria are provided in Table A.4, the performing laboratory shall perform to its quality assurance plan(s).

Due to the developmental work being done with the analysis procedures and potential sample differences (between tanks), changes in procedures may be needed. These changes must be documented in controlled notebooks referenced in the deliverable reports to ensure traceability.

4.0 ORGANIZATION

The organization and responsibility of key personnel involved in this tank BY-108 vapor sampling project are listed in Table A.5.

Table A.5. Tank BY-108 Project Key Personnel List.

Individual(s)	Organization	Responsibility
S. C. Goheen	Pacific Northwest Laboratory	Project Manager for Vapor Sample Characterization
R. A. Jenkins	Oak Ridge National Laboratory	Project Manager for Vapor Sample Characterization
J. G. Kristofzski	WHC 222-S Laboratory	Project Manager for Sample Radiological Survey
B. C. Carpenter C. S. Homi	TWRS Characterization Support	BY-108 Tank Characterization Plan Engineers
J. L. Huckaby	TWRS Tank Vapor Issue Resolution Program	Vapor Issue Resolution Engineer
H. Babad	TWRS Characterization Program	Tank Safety Screening Scientist
R. S. Viswanath	Field Analytical Services	Special Analytical Studies Vapor Sampling Technical Support
R. D. Mahon	Field Analytical Services	Sampling and Mobile Laboratories Vapor Sampling Program Lead
E. H. Neilsen	Waste Tank Safety Engineering	Vapor Sampling Cognizant Engineer
D. R. Carls	Industrial Hygiene and Safety Program	Industrial Hygiene Point of Contact if Notification Limit is Exceeded (FAX 372-3522)
East Area Shift Operations Manager	Tank Farm Operations	East Tank Farm Point of Contact if Notification Limit is Exceeded (373-2689)

5.0 EXCEPTIONS, CLARIFICATIONS, AND ASSUMPTIONS

Trip Blanks and Field Blanks

Trip Blanks are sampling devices prepared and handled in the same manner as samples, except that they are never opened in the field. Field Blanks are sampling devices prepared and handled in the same manner as the samples, but no tank samples are collected with them. Laboratories supplying blanks may opt to analyze only 1 trip blank unless it is determined to be contaminated, in which case all trip blanks are to be analyzed.

Sample Custodian

The sample custodian is the designated FAS cognizant scientist or assisting scientific technician, lead sampler, or laboratory scientist or technician who signs the *received by* block on the chain of custody. Transfer of custodianship occurs when the custodian signs the *relinquished by* block on the chain of custody and releases the sample(s) to the new custodian signator.

Physical Control

Physical control of a sample includes being in the sight of the custodian, in a room which shall signal an alarm when entered, or locked in a cabinet.

6.0 DELIVERABLES

The Pacific Northwest Laboratory, Oak Ridge National Laboratory, and Sampling and Mobile Laboratories VSS sampling and analyses of tank BY-108 vapors shall be reported as Format VI (Section 6.3). In addition, the analytical laboratories shall receive Format II reports from Sampling and Mobile Laboratories as described in Section 6.2. Any analyte exceeding the notification limit prescribed in Table A.4 shall be reported as Format I (Section 6.1). Other organic species detected at levels deemed sufficient by the laboratory scientist to be of potential toxicological concern shall also be reported following Format I. Additional information regarding reporting formats is given in Schreiber (1994a, 1994b, 1994c).

6.1 Format I Reporting

Table A.4 contains the notification limits for specific analytes. Analytes that exceed notification limits defined in the DQO processes shall be reported by the Project Manager, delegate, or Health Physics Management by calling the East Area Shift Manager of Tank Farm Operations at (509) 373-2689 immediately. This verbal communication must be followed within 3 working days by written communication to J. W. Osborne of the Tank Vapor Issue Resolution Program, D. R. Carls in the Industrial Hygiene and Safety Program, and D. R. Bratzel of the Characterization Program, documenting the observation(s). A further review of the data, including quality control results and additional analyses for verification of the exceeded analyte, may be contracted between the performing laboratory and the contacts above.

6.2 Format II Reporting

Results of the 222-S Laboratory's radiological survey shall be reported by Sampling and Mobile Laboratories as Format II to the analytical laboratories listing the picocuries per sample (pCi/g of sample) for each sample submitted for analysis. This Format II report should also provide the sample collection sequence and volumes, verification of trip and field blank use, and any anomalous sampling conditions to accompany, if possible, the shipment of samples. Alternatively, this sampling report may be transmitted by FAX to the analytical laboratories within 48 hours after the samples have been shipped.

6.3 Format VI Reporting

All Format VI reports shall be delivered to J. W. Osborne of the Tank Vapor Safety Resolution Program, R. S. Viswaneth of Field Analytical Services,

the Characterization Program Office, Analytical Services, and the Tank Characterization Resource Center.

Each analytical laboratory and SML shall deliver three reports. Sampling and analytical data are requested within 5 weeks after receipt of both the samples and supporting data and shall consist of, at a minimum, data tables reporting sample collection data, industrial hygiene tank monitoring data, and radiation screening results obtained by SML, or the results of each analysis performed by the analytical laboratories. A final report shall be delivered within a nine week period after receipt of both the samples and supporting data. A cleared final report shall be delivered after it has completed the proper clearance. Final reports shall be submitted to clearance in parallel to being submitted to the WHC customers identified above.

The final sampling report from Sampling and Mobile Laboratories shall be a WHC supporting document, with sponsor-limited release. It should include:

- 1) A description of sampling equipment used;
- 2) a description of sampling quality controls applied (e.g., leak and cleanliness tests of the sampling manifold, system temperature and pressure monitoring/alarms, instrument calibration details);
- 3) sampling event chronology and sample collection schedule (complete list of samples, by ID#, time collected, flow rates, etc.);
- 4) any industrial hygiene tank monitoring data collected before or during sampling event;
- 5) an evaluation of sources of sampling errors;
- 6) sample radiation screening results;
- 7) sample storage and shipment details; and
- 8) copies of all chain-of-custody forms.

The cleared final report from the analytical laboratories shall be acceptable for distribution to the public. To the extent possible, the final reports should include:

- 1) A summary of analytical results;
- 2) a description of sample device preparation (and manufacture if appropriate), citing procedures and logbooks used;
- 3) references providing traceability of sample device cleanliness;
- 4) a brief description of analytical methods, with procedures cited;
- 5) a brief explanation of how analytical systems control was demonstrably maintained;
- 6) a brief description of sample storage and shipment conditions, citing procedures and logbooks used;
- 7) a listing of analytes of quantitation (target analytes), with analytical method detection limit, range for which instrumentation is calibrated, number of calibration points used, and statistical data on linearity of calibration;
- 8) quantitative analytical results, expressed as dimensionless (ppmv or ppbv) concentration, and mass concentration ($\mu\text{g}/\text{m}^3$, mg/L , etc., calculated at 0 °C and 1 atm) of target analytes (identified by name and Chemical Abstract Service number) in each tank air sample;
- 9) tentative identification and semi-quantitative analytical results, expressed in both mass and dimensionless concentrations (if possible) of non-target organic analytes (identified by name and Chemical Abstract Service number) in each organic vapor sample;

- 10) a statistical summary (i.e., mean, standard deviation) for multiple analyses and/or multiple samples for all analytes (positively and tentatively identified compounds) in both mass and dimensionless concentrations (if possible);
- 11) a summary of all exceptional conditions, such as deviations from procedure or protocol, results obtained outside of instrument calibration range, sorbent trap breakthrough of analytes, or poor surrogate recoveries; and
- 12) chain-of-custody forms attached.

7.0 CHANGE CONTROL

Under certain circumstances, it may become necessary for the performing laboratory to make decisions concerning a sample without review of the data by the customer or the Characterization Program. These changes shall be brought to the attention of the project manager and the Characterization Program as quickly as possible and documented accordingly. Changes must be justified in their documentation. Changes may be documented through the use of internal change notices or analytical deviation reports for minor, low-impact changes. All significant changes (such as changes in scope) shall be documented by Characterization Support via an Engineering Change Notice to this Tank Characterization Plan. All changes shall also be clearly documented in the final data package.

Additional analysis of sample material from this vapor space characterization project at the request of the Characterization Program shall be performed according to a revision of this Tank Characterization Plan.

8.0 REFERENCES

- American Society of Mechanical Engineers, NQA-1, *Quality Assurance Program Requirements for Nuclear Facilities*.
- Barnes, B. O., 1994, *Quality Assurance Plan for TWRS Waste Tank Safety Program*, MCS-027 Rev. 4, Pacific Northwest Laboratory, Richland, Washington.
- Bratzel, D. R., 1994, *Letter or Instruction for Radiological Analyses to Support Fiscal Year 1995 Tank Vapor Sampling*, (internal memo 74310-94-32 to J. G. Kristofzski, November 30), Westinghouse Hanford Company, Richland, Washington.
- Bellus, T. H., 1993, *Configuration of Hewlett Packard (HP) 5890 Series II Gas Chromatograph (GC) for DML1*, (internal memo 12240-SAA93-039 to L. L. Lockrem, July 10), Westinghouse Hanford Company, Richland, Washington.
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- Keller, K. K., 1994, *Quality Assurance Project Plan for Tank Vapor Characterization*, WHC-SD-WM-QAPP-013, Rev.2, Westinghouse Hanford Company, Richland, Washington.

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- United States Code of Federal Regulations, 10 CFR Part 830, *Nuclear Safety Management*; Section 120, *Quality Assurance Requirements*.
- Whelan, T. E., 1994, *TWRS Characterization Program Quality Assurance Program Plan*, WHC-SD-WM-QAPP-025, Westinghouse Hanford Company, Richland, WA.